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July 3, 2024

By ECF

The Honorable Taryn A. Merkl,  
United States Magistrate Judge,  
U.S. District Court for the Eastern District of New York,  
225 Cadman Plaza East,  
Brooklyn, New York 11201.

Re: *Bartlett v. Société Générale de Banque au Liban SAL*, No. 19-cv-00007-CBA-TAM

Dear Judge Merkl:

I write on behalf of non-party Standard Chartered Bank (“SCB”) and in respect of the Court’s June 20, 2024 Order, which granted Moving Defendants<sup>1</sup> leave to file proposed redactions to the Third Amended Complaint (“TAC”) under seal and directed Moving Defendants to provide a copy to SCB. SCB has reviewed the TAC and does not seek additional redactions beyond those proposed by Moving Defendants, which SCB agrees are warranted. (*See* ECF No. 414.)

The Second Circuit has long recognized that “the privacy interests of innocent third parties . . . should weigh heavily” against the public disclosure of information belonging to those third parties. *United States v. Amodio*, 71 F.3d 1044, 1050 (2d Cir. 1995) (citing *Gardner v. Newsday, Inc.*, 895 F.2d 74, 79-80 (2d Cir. 1990)). Those interests are heightened when the information in question is of a type “traditionally considered private rather than public.” *Id.* at 1051. “[P]ersonal and financial information implicates privacy interests that overcome the presumption of public access” and warrant redaction. *S.E.C. v. Ripple Labs, Inc.*, 2023 WL 3477552, at \*7 (S.D.N.Y. May 16, 2023). As Moving Defendants explain in their June 13, 2024 letter (ECF No. 403), the proposed narrow redactions would protect non-party customer information—customer names and account numbers—derived from bank records that were produced by non-party correspondent banks, including SCB, pursuant to the Court’s Protective Order.

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<sup>1</sup> Moving Defendants are (1) Société Générale de Banque au Liban S.A.L., (2) Fransabank S.A.L., (3) MEAB Bank s.a.l., (4) BLOM Bank S.A.L., (5) Byblos Bank S.A.L., (6) Bank Audi S.A.L., (7) Bank of Beirut S.A.L., (8) LGB Bank s.a.l., (9) Banque Libano Française S.A.L., (10) Bank of Beirut and the Arab Countries S.A.L., and (11) Fenicia Bank S.A.L.

Therefore, SCB respectfully requests that the Court permit the TAC to be filed with the redactions proposed by Moving Defendants.

Respectfully,

/s/ Andrew J. Finn  
Andrew J. Finn

cc: All counsel of record (via ECF)